

1 BENEDICT Y. HUR (224018)  
(bhur@cooley.com)  
2 SIMONA AGNOLUCCI (246943)  
(sagnolucci@cooley.com)  
3 EDUARDO E. SANTACANA (281668)  
(esantacana@cooley.com)  
4 ARGEMIRA FLÓREZ (331153)  
(aflorez@cooley.com)  
5 NAIARA TOKER (346145)  
(ntoker@cooley.com)  
6 HARRIS MATEEN (335593)  
(hmateen@cooley.com)  
7 THILINI CHANDRASEKERA (333672)  
(tchandrasekera@cooley.com)  
8 ISABELLA MCKINLEY CORBO (346226)  
(icorbo@cooley.com)  
9 CHELSEA HU (357212)  
(chu@cooley.com)  
10 **COOLEY LLP**  
11 3 Embarcadero Center, 20th Floor  
San Francisco, CA 94111-4004  
12 Telephone: (415) 693-2000  
Facsimile: (415) 693-2222

13 ||| Attorneys for Defendant  
GOOGLE LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

19 ANIBAL RODRIGUEZ, et al. individually and  
on behalf of all others similarly situated.

**Plaintiffs,**

V.

GOOGLE LLC.

**Defendant**

Case No. 3:20-CV-04688-RS

**DECLARATION OF HARRIS MATEEN IN  
SUPPORT OF GOOGLE LLC'S MOTION IN  
LIMINE NO. 14 TO EXCLUDE UNTIMELY  
AND IRRELEVANT TESTIMONY REGARDING  
RECENT DATA BREACHES**

Dept: 3, 17<sup>th</sup> Fl.  
Judge: Hon. Richard Seeborg  
Date Action Filed: July 14, 2020  
Trial Date: August 18, 2025

I, Harris Mateen hereby declare as follows:

1. I am an associate with the law firm Cooley LLP and am counsel for Defendant Google LLC in the above captioned action. I am licensed to practice law in the state of California and am admitted to practice before this Court. I have personal knowledge of the matters stated here, and if called as a witness, I could and would testify to them. I submit this declaration in support of Defendant Google LLC's Motion in Limine No. 14 to exclude untimely and irrelevant testimony about recent data breaches, filed concurrently.

2. On August 8, 2025, Plaintiffs' counsel emailed Google's counsel stating that "Professors Schneier and Hochman intend to testify at trial about recent data breaches Google has experienced[,"] and provided a hyperlink to an August 8, 2025 Forbes.com article titled *Google Data Breach — August 8 Email Warnings Now Confirmed*.

3. A true and correct copy of the email from Plaintiffs counsel is attached hereto as

## **Exhibit A.**

4. A true and correct copy of the hyperlinked Forbes.com article, downloaded on August 10, 2025, is attached as **Exhibit B**.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 12, 2025, at San Francisco, California.

/s/ Harris Mateen  
Harris Mateen